

SUZANNE GREENE
SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 CIVIL ACTION NO: 1:19-CV-01338-AT
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7 SUZANNE GREENE,
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9 Plaintiff,
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11 vs.
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13 TYLER TECHNOLOGIES,
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15 Defendant.
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DEPOSITION OF: SUZANNE GREENE

AUGUST 29, 2019

9:53 A.M.

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1 Q. (By Mr. McKeeby) So your
2 clients -- I assume you anticipated my next
3 question. Your clients are no longer
4 government entities, I take it, since -- at
5 O'Ryan?

6 A. That is correct, yes, sir.

7 Q. They're law firms?

8 A. That is correct.

9 Q. And are you -- what's your
10 position?

11 A. I'm a project manager here.

12 Q. Do you work out of your home?

13 A. I do not, no, sir.

14 Q. What office do you report to?

15 A. Right in Marietta.

16 Q. And when did you first start
17 working at O'Ryan?

18 A. June of this year.

19 Q. And are you paid salary or by the
20 hour at O'Ryan?

21 A. I'm paid salary.

22 Q. Do you receive overtime?

23 A. I do not, no, sir.

24 Q. What's your salary?

25 A. It's 60,000.

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1 Q. And I take it you interviewed for
2 a position at O'Ryan?

3 A. I did, yes, sir.

4 Q. And did you present them with a
5 copy of your resume?

6 A. Yes. Excuse me, let me actually
7 back up a little bit. I didn't give them the
8 copy of the resume there. I had applied on
9 Indeed and uploaded the copy of my resume on
10 Indeed. So they received my resume from
11 Indeed.

12 Q. Thank you for --

13 A. Yes.

14 Q. -- that correction.

15 (Whereupon, Exhibit 2 was marked
16 for identification.)

17 Q. (By Mr. McKeeby) I've marked as
18 Deposition Exhibit 2 what's been produced in
19 this case as your resume. Would you agree
20 with that characterization?

21 A. Yes, sir.

22 Q. Is this, as far as you know, a
23 true and correct copy of the resume that you
24 presented to O'Ryan in connection with your
25 employment?

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1 A. Yes, sir.

2 Q. And did you present this -- well,
3 I don't know how to honor your correction. Do
4 you have an understanding that this resume was
5 presented to other employers as well or just
6 O'Ryan?

7 A. I don't understand that
8 question, I'm sorry.

9 Q. You uploaded a resume on Indeed, a
10 job site service; correct?

11 A. Yes, sir.

12 Q. This is the resume that you
13 uploaded?

14 A. Yes, sir.

15 Q. Were there any other versions of
16 the resume that you utilized since your
17 employment with Tyler other than this
18 document?

19 A. No, sir.

20 Q. Did you actually provide this
21 resume to any employers other than through
22 Indeed?

23 A. No -- hold on, let me back that
24 up. Because I also uploaded this on
25 LinkedIn. So then, I guess that would also

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1 technically count for other people getting it
2 off of Indeed.

3 Q. So you uploaded the resume on
4 LinkedIn as well as Indeed?

5 A. Yes, sir.

6 Q. And I guess you would agree with
7 me that the resume is truthful and accurate?

8 A. Yes, sir.

9 Q. Is -- in terms of your job duties,
10 I understand it's a different kind of software
11 with a different kind of client. But is the
12 project manager position that you have with
13 O'Ryan similar to the project manager position
14 that you had during the first several months
15 of your employment with ExecuTime before the
16 Tyler acquisition?

17 A. Similar in what ways?

18 Q. Any ways?

19 A. So in certain ways, yes, because
20 I am -- I'm actually managing the projects
21 with this company, I'm not assisting.

22 Q. Okay. And you were assisting
23 while you were at ExecuTime because you were
24 new, as you testified to, and Mr. Jenkins and
25 you worked together; correct?

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1 course.

2 Q. What else?

3 A. Um --

4 Q. Travel?

5 A. Yes, yes, sir. And I would
6 travel and do those specific things, like go
7 train people and travel, yes.

8 Q. Right. Obviously, you're
9 traveling to do some of these things, but
10 you're also traveling as part of your job?

11 A. Yes, sir.

12 Q. What other duties did you have,
13 again, just sort of listing them by category?
14 Are there any other duties?

15 A. Not that I can think of off the
16 top of my head.

17 Q. We can come back to it if we need
18 to.

19 A. Okay.

20 Q. Just so that we're clear, are you
21 comfortable if I refer to the ExecuTime
22 software -- you mentioned that it's divided
23 between time and attendance -- the time and
24 attendance module and the advanced scheduling
25 module. But it all relates to payroll;

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1 correct?

2 A. Essentially, that is the end

3 result, is producing the actual payroll.

4 Q. I mean, that's what the objective

5 of the software is, to make sure the payroll

6 is done properly; correct?

7 A. So we don't actually do the

8 payroll portion, but to make sure that the

9 time is accurate, yes.

10 Q. And the time needs to be accurate

11 because if it's not, then the compensation

12 won't be accurate?

13 A. That is correct.

14 Q. So you would agree with me that --

15 that it was critical that the software be --

16 that the software perform correctly?

17 A. Yes, sir.

18 Q. And, for example, as I understand

19 it, before you could quote, Go-Live, unquote

20 with the software, you actually had to have

21 two test runs before the hand to make sure the

22 software was operating properly; correct?

23 A. That is correct.

24 Q. And the concept of going live,

25 tell me what that means.

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1 testing, for the most part.

2 Q. Did you ever have a situation
3 after Go-Live when the software didn't work
4 properly that you were involved in while you
5 were at Tyler?

6 A. After the Go-Live? I'm just --
7 I'm trying to just think if there were any
8 situations, because essentially, once they
9 Go-Live, they go over to support. So I don't
10 deal with them, once they go to support,
11 they're off my plate and I'm completely done
12 with them.

13 Q. And there's a concept of being
14 passed to support; correct?

15 A. Yes, sir.

16 Q. And that's at the end of the
17 implementation process?

18 A. Yes, sir.

19 Q. And is that before or after
20 Go-Live?

21 A. After Go-Live, the project
22 manager then steps up to transfer them over
23 to support.

24 Q. And the project manager would
25 consult with you in connection with passing

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1 the client to support; correct?

2 A. Yeah. Well, they're involved
3 the whole way, so they know where the client
4 is. And because we were in so much contact
5 with different scenarios, when I would reach
6 out to the project manager, they knew where
7 the client was, you know, the whole time
8 through parallel testing and stuff.

9 Q. They knew -- the project manager
10 would know based on communications from you?

11 A. That is correct, yes, sir.

12 Q. And so you would be updating the
13 project manager periodically about how the
14 implementation was going, were they meeting
15 deadlines, were they ready to be passed to
16 support, that type of thing?

17 A. Yes. And the project manager
18 also -- so different project managers handle
19 it currently.

20 Q. Okay.

21 A. When I was with Talia, she would
22 request and receive all of the checklists
23 throughout the process. So she knew very
24 well where everyone was at, because she's
25 requesting the documents that are needed to

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1 A. Yes, sir.

2 Q. Okay. And would you be on that
3 call typically?

4 A. I just started being on those
5 calls probably around December or January,
6 but before, no, I was never on those calls.

7 Q. And just so we're clear, support
8 is a different service that the client
9 purchases when they buy the ExecuTime
10 software; correct?

11 A. I'm not sure how that goes on
12 the sales side.

13 Q. Okay. But you know -- you would
14 review the client contracts as part of your
15 preparation for particular implementations;
16 correct?

17 A. Yes, sir.

18 Q. But those contracts didn't discuss
19 support or you just don't remember?

20 A. I don't recall. That may have
21 been something that was just included, but
22 I -- honestly, I'm not sure.

23 Q. And did you have discussions with
24 your project managers about where clients were
25 as to whether or not they were ready to be

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1 passed through support?

2 A. Yes.

3 Q. And what would that be based on?

4 A. If there were any issues that
5 they ran into, if the time wasn't matching up
6 correctly, I mean, there could be numerous
7 different things that could prevent a
8 Go-Live.

9 Q. Well, I'm not talking about a
10 Go-Live, I don't think. I was saying, okay,
11 being passed to support -- which I understood
12 occurred after Go-Live?

13 A. Right. So essentially you have
14 to Go-Live to go to support. So my
15 apologies.

16 Q. No, that's all right. But I'm
17 going to make sure you were answering the
18 question you thought you were answering. So
19 in order to be passed to support, you had to
20 make sure that there were no technical issues,
21 I guess?

22 A. Yes, sir, that's correct.

23 Q. Okay. And you would discuss those
24 issues with the project manager?

25 A. If needed, yes.

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1 Q. And the project plan has various
2 deadlines?

3 A. That the project manager does,
4 yes.

5 Q. Okay. For training?

6 A. Uh-huh.

7 Q. For integration?

8 A. (Nodding.)

9 Q. Yes?

10 A. That is correct, yes, and the
11 project manager sets all of those dates.

12 Q. Okay. So that's a checklist that
13 you have when you take over -- when the
14 implementation is handed off to you?

15 A. I can see the dates, yes.

16 Q. Were there any situations where
17 you had to -- you being Tyler, had to postpone
18 a Go-Live date?

19 A. Oh, yes, for sure. That was not
20 uncommon.

21 Q. That could be the result of
22 technical issues?

23 A. Could be -- it could be
24 technical issues, it could be time not adding
25 up. It could be they just need more time. I

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1 mean, it could vary on numerous different
2 things.

3 Q. Need more time to do what?

4 A. To maybe, you know, get more
5 people in the application or whatever it is
6 that they may need more time for. Sometimes
7 they have other things coming up or other
8 projects, things of that sort.

9 Q. And that could, for example, delay
10 the training?

11 A. It could, yes, sir.

12 Q. Did you ever have a situation
13 where you delayed a Go-Live date because the
14 training wasn't going well in the sense that
15 the users -- I know there's power users and
16 end users, but in situations where the users
17 weren't picking up on the training as well as
18 you thought they should have?

19 A. I mean, there has been
20 situations; like there was one client where
21 it was majority older -- I guess you could
22 say seasoned people.

23 Q. Fair enough.

24 A. And with that, a lot of them
25 didn't even know how to work, like, smart

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1 phones. I actually had to go on site and do
2 a little bit more hand holding. So depending
3 on the client, situations like that could
4 happen, yes.

5 Q. What client was that?

6 A. Alexander County, they were in
7 North Carolina.

8 Q. Okay. Did you have to delay the
9 Go-Live date with them?

10 A. They drug their feet for a
11 while. They were actually around for a
12 couple of years because they were -- how is a
13 nice way to put this. They were kind of
14 doing their time, like, old school, where
15 they were writing it all down on paper and --
16 yeah.

17 Q. But that's a situation where the
18 Go-Live date had to be changed?

19 A. Yeah, multiple times with them,
20 they were around for a while. They kept
21 putting it on -- because what you can do is
22 but a project on hold, quote, unquote, where
23 you basically put it on hold and then you
24 pick back up when the client's ready.

25 Q. And is that a situation where you

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1 went to the customer's location to do what

2 I'll call on-site training?

3 A. Once I went on site, we were

4 able to move through with the actual project.

5 But I did go on site for them, yes.

6 Q. Was it -- on that project

7 specifically, was it not originally

8 contemplated that you would be going on site?

9 A. I'm not sure. The project

10 manager discusses all of that.

11 Q. Okay. Did you report to the

12 project manager what you observed in terms of

13 the training in that example?

14 A. Well, with that actual training,

15 I only went on site for the power user

16 training.

17 Q. Okay.

18 A. But yeah, I let her know they

19 were elder and they were -- seasoned, I'm

20 sorry, they were having a little bit harder

21 time using the software.

22 Q. Got it.

23 And that ultimately resulted in a

24 delay of the original Go-Live date?

25 A. Well, yeah, but they were --

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1 once I got them, they had already been
2 lingering for about a year and a half with
3 ExecuTime.

4 Q. Okay. But was it -- was there
5 another Go-Live date that had to be postponed
6 as a result of them being slow learners of
7 having trouble using the software, for
8 whatever reason, be it their seasonedness or
9 otherwise?

10 A. Yeah. I want to say we had to
11 push it out slightly, but it wasn't like
12 another year or anything. They just needed a
13 little bit more time to work in the
14 application.

15 Q. Did -- what was the -- maybe a
16 question that you can't answer but I'll ask
17 it. Was there a typical duration of
18 implementation process?

19 A. Typically, yes, about 120 days.

20 Q. Okay. Now, does that 120 -- I
21 understand that's going to vary depending on
22 some of the factors that we've already touched
23 on. Is that a period that would be set forth
24 in the contract?

25 A. I'm not sure they put it in the

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1 A. So essentially, when I get the
2 actual client, I go through with the client
3 and do, like, a power user training. And --
4 excuse me, let me back up.

5 Prior to the power user
6 training, I go through the questionnaire and
7 the solution design that the project manager
8 had put together from the actual client. So
9 I go through the information that they have
10 gathered based on their specific policies and
11 procedures.

12 Q. Based on the client's specific
13 policies and procedures?

14 A. Yes, sir, that is correct. So
15 based on the client's specific policies and
16 procedures, and then I would do --

17 Q. Now, what are you reviewing? I'm
18 sorry to interrupt.

19 A. The questionnaire and the
20 solution design that the project manager put
21 together with the client.

22 Q. Okay.

23 A. So they went through a series of
24 questions with them and kind of noted, you
25 know, everything down.

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1 Q. These are two separate documents?

2 A. Yes, sir.

3 Q. You would review those -- is this
4 after handoff or before handoff?

5 A. This would be around the time of
6 handoff, I would go through the documents.

7 Q. What would be your objective in
8 reviewing the questionnaire and the solution
9 design?

10 A. To see what their policies are
11 and how the application needs to be set up.
12 Because there are certain things that I would
13 need to turn on -- like, in the system admin
14 preferences, I guess we can call it, like the
15 preferences option, where, for example, maybe
16 some places use comp time and some places do
17 not. It's as simple as going under the
18 preferences and checking a box to allow them
19 to actually use it.

20 Q. And you would know from the
21 questionnaire -- or I guess both the
22 questionnaire and the solution design, for
23 example, whether or not this particular client
24 used comp time?

25 A. Yes, sir.

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1 Q. And that would affect the initial
2 setup?

3 A. Yes, sir.

4 Q. Would that be the next thing you
5 would do in the process, would the initial
6 setup?

7 A. Yes, once I go through the
8 solution design and the questionnaire, then I
9 do pretty much like a generic setup so to
10 say, based off of their solution design for
11 the power admin training that I'm going to do
12 with them. Because I want to allow them to
13 be able to see how they would use the
14 software.

15 Q. Okay. And then would the next
16 step in the process typically be the power
17 admin training?

18 A. Yes, sir. Typically, yes.

19 Q. And that could occur either
20 remotely or on site; correct?

21 A. Yes, depending on what the
22 client and the project manager discussed.

23 Q. In terms of the implementations
24 that you performed, generally -- or
25 approximately, what percentage were remote

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1 versus on site, in terms of the training?

2 A. So some clients would only do
3 power admin on site. And then they would
4 split up and do some of the end user, super
5 user remote. Some would do it vice versa.
6 So it really depends.

7 I would guesstimating about 40
8 percent of them would go -- like 30 to 40
9 would do onsite on different portions of the
10 training.

11 Q. Okay. So -- so I think you
12 answered my question but I want to make sure.
13 So of all of the implementations that you did
14 at Tyler, you were actually at the customer
15 location approximately 30 to 40 percent of the
16 time?

17 A. Around that, yes, sir.

18 Q. Okay. And the reason that you
19 were on site could vary too, but typically
20 would involve power user training?

21 A. Typically, yes, sir.

22 Q. And it may or may not involve end
23 user and super user training?

24 A. Yes, sir.

25 Q. Okay. So I guess the -- we've

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1 my -- I guess you could say kind of like a
2 calendar, so to say, of when these items are
3 due.

4 Q. Okay.

5 A. I'll use that for --

6 Q. So the project plan contains the
7 deadlines?

8 A. Yes, sir.

9 Q. Within these checklists?

10 A. Yes, sir. And additional
11 details about what exactly is due on the
12 checklist, it kind of breaks it all down for
13 them.

14 Q. And because you were dealing with
15 multiple implementations at any one time,
16 that's what you mean when you have to manage
17 the client implementations simultaneously?

18 A. Right.

19 Q. And so you would have to determine
20 your schedule from week to week based on these
21 deadlines?

22 A. That is correct, yes, sir.

23 Q. It wasn't like every week you got
24 a schedule saying, hey, you need to do this on
25 a particular date, and then Wednesday you need

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1 do initial setup for this project, and on

2 Thursday, you need to do end user training?

3 You didn't get itemized schedules delineating

4 your functions on a week-to-week basis?

5 A. No, I did not.

6 Q. That's a true statement?

7 A. That is a true statement.

8 MR. HERRINGTON: Sir, would you
9 repeat that question?

10 MR. MCKEEBY: No.

11 MR. HERRINGTON: Can you read
12 it?

13 When lawyers say, Is that a true
14 statement, I get worried.

15 MR. MCKEEBY: Oh, no, I just
16 thought we had a double negative there.

17 MR. HERRINGTON: Okay.

18 MR. MCKEEBY: And I'll not
19 repeat the question, I'll ask the court
20 reporter to read it back.

21 (Record read.)

22 MR. HERRINGTON: Okay. Thank
23 you.

24 MR. MCKEEBY: Okay. All right.

25 MR. HERRINGTON: I thought she

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1 Q. But you do lead the teams?

2 A. As far as when their due dates
3 and things are concerned, I will reiterate
4 that, yes.

5 Q. And the project objectives, how
6 did you know what the project objectives were?

7 A. That was based off of the
8 project manager. And what was within the
9 actual project plan. So even though the
10 project manager already goes through that
11 with the client, it's still my job to make
12 sure they understand they have to stay on
13 that track.

14 Q. But you had to understand what the
15 project objectives were?

16 A. Yes, sir, like as far as the
17 checklists and things are concerned.

18 Q. You would determine those
19 objectives by reviewing the solution design
20 and the project plan?

21 A. More so the project plan.
22 Because the solution design more so gives
23 information of their internal policies and
24 procedures and the project plan is what the
25 project manager puts together, actually,

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1 putting dates for their deadlines.

2 Q. The next bullet and then we will
3 take a break, if that's okay?

4 A. Sure.

5 Q. Strong leadership and delegation
6 skills. To whom did you delegate tasks?

7 A. To the client.

8 Q. What kinds of things would you
9 delegate to the client?

10 A. I would do certain things like,
11 let's say, we had the power user checklist,
12 so it's already listed out as far as what
13 they need to do. And I would just delegate
14 and say, okay, these are the specific items
15 that need to be completed by this date,
16 pretty much like reiterating the project plan
17 that was already put together.

18 Q. So you're delegating particular
19 functions associated with the implementation
20 process to someone on the project team?

21 A. Can you repeat that for me?

22 MR. MCKEEBY: Can you read that
23 back?

24 (Record read.)

25 THE WITNESS: Yes.

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1 be to perform the training?

2 A. Most of the time, yes.

3 Q. Okay. And then the next part of
4 the fourth bullet says, "Track project against
5 timeline, milestones and budget and revise as
6 needed"?

7 A. That is correct.

8 Q. What would you be revising?

9 A. So with that, if there was
10 something within the progress -- I'll just
11 give you an example. Let's say that they're
12 behind schedule as far as doing the end user,
13 super user training, so prior to the
14 trainings, there's generally a checklist that
15 is required prior to. So, for example, you
16 have the power user checklist, that's
17 supposed to be completed prior to the end
18 user, super user. If it was not, then at
19 that point, I would reach out to the project
20 manager to let them know, hey, this needs to
21 be revised, we may need to push out the date,
22 and then they would actually update the
23 project plan.

24 Q. Okay. So you wouldn't actually
25 revise the -- the revise in that bullet in

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1 your resume doesn't mean changing the actual
2 terms of a document?

3 A. No. That's not what that means
4 there, no.

5 Q. Right. It means communicating
6 that something needs to be changed and then
7 the project manager would make that change?

8 A. That is correct.

9 Q. Got it. Okay.

10 I set up the question about the
11 training and I didn't ask what I wanted to.

12 So when you're at -- when you're
13 training at the facility -- and I understand
14 sometimes it happened on the web training too,
15 where you weren't at the facility?

16 A. Yes.

17 Q. But when you were at the facility
18 doing the training that you described, you're
19 there by yourself; correct?

20 A. Sometimes.

21 Q. Typically?

22 A. Typically, yes.

23 Q. Okay. Who else, on those
24 occasions that are atypical, would the project
25 manager might also be there?

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1 So milestones are essentially -- they're kind
2 of like a checklist so to say. But that's
3 something that, you know, I would make sure
4 that whatever the project manager put within
5 the project plan, I need to ensure that the
6 client's essentially meeting those.

7 Q. But is milestones the same as a
8 deadline?

9 A. Pretty much, yes, sir.

10 Q. Okay. And if the client wasn't
11 meeting a milestone or deadline, you would
12 communicate that to the project manager?

13 A. Absolutely.

14 Q. And that's the kind of thing that
15 might result in postponing a Go-Live deadline?

16 A. That could be one of the many
17 reasons, yes.

18 Q. Now, what is the budgeting -- what
19 is the budget -- the "Track progress against
20 budget" mean?

21 A. So the budget, each client can
22 purchase different amounts of hours. So
23 depending on how many hours they had, that
24 would be communicated from the manager to the
25 project manager and myself.

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1 And for a short period of time,
2 we were updating the actual -- within the
3 project plan, there was a portion that would
4 show the hours they had and then it would
5 subtract the time that we were working on
6 that. So if they got under, I believe it was
7 10 or 12 hours, then I needed to notify the
8 project manager so then they can speak to the
9 client and have them purchase more hours, if
10 necessary.

11 Q. Okay. Did you ever recommend to
12 the client that they might need more hours?

13 A. Not unless I spoke to the
14 project manager first, no.

15 Q. Okay. You would recommend -- you
16 would alert the project manager to the fact
17 that they needed more hours based on the
18 budget?

19 A. That is correct.

20 Q. Okay. And when you're saying
21 "hours," you're meaning training hours?

22 A. Right. Yes. Yes, sir. And
23 those hours could also be used for some
24 troubleshooting and setup and things of that
25 sort as well.

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1 amount based off of what the project manager
2 set up.

3 So it would actually -- all I
4 would do is enter in the time that I worked
5 that was actually billable, and it would
6 deduct it automatically, so I didn't really
7 have to factor anything.

8 Q. Well, but you did have to track
9 the budget; correct? Is what your resume says
10 or?

11 A. Yes. Yes. Yes, sir, that is
12 correct.

13 Q. Okay. Now, am I right that there
14 are -- one of the things that you did at the
15 initial stage of an implementation would be to
16 review the contract; did you do that?

17 A. Yes, sir.

18 Q. Okay.

19 A. I would briefly look over the
20 contract; I didn't go into much detail with
21 that.

22 Q. And would you agree with me that
23 there were different types of contract options
24 that the client had?

25 A. Yes, sir.

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1 things you did was "Provide effective training
2 to maximize the use of the software"?

3 A. Yes, sir.

4 Q. So is it a true statement then
5 that the effectiveness of your training
6 affected whether or not the customer, client
7 was able to maximize their use of the
8 software?

9 A. Not necessarily, because it
10 depends on if they're -- for example, like my
11 seasoned client where my training was still
12 the same as I do with every other client,
13 they were just having a harder time
14 understanding.

15 Q. Right. So I understand that
16 effective training might not always lead to
17 maximization of the use of the software.
18 Right?

19 A. Yes.

20 Q. But if you provided ineffective
21 training, you wouldn't expect that the
22 maximization of the use of the software to
23 occur; correct?

24 A. Correct.

25 Q. And then the last two bullets are

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1 Q. Okay. And how would you become
2 aware that these problems were occurring? The
3 client would advise you or were you able to
4 see this during training or through some other
5 way?

6 A. They would communicate that with
7 me.

8 Q. Okay. They might communicate that
9 to you during a weekly call, for example?

10 A. Absolutely, yes.

11 Q. Can you think of an example where
12 an issue like this was communicated to you by
13 a particular client?

14 A. I mean, Turlock, California, is
15 a good example, because they used to run into
16 different issues. One they had even -- was a
17 visual issue within the application. So
18 those types of troubleshooting would not be
19 billable, but of course, we would still have
20 to complete the troubleshooting.

21 Q. How did you know what was billable
22 and what wasn't? Or did you make that
23 determination?

24 A. Well, we would make the
25 determination based off of the list that our

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1 implementation manager had sent out as far as
2 what's billable and what is not.

3 Q. And troubleshooting wasn't on the
4 list?

5 A. Well, certain troubleshooting
6 is, yes. But if it had something to do with
7 a defect, then no. You would basically
8 troubleshoot and not bill the time.

9 Q. Okay. And so what troubleshooting
10 would not involve a defect?

11 A. Overtime not populating, that's
12 not a defect, that's just either the correct
13 employee is not attached to the correct
14 policy, that could be something as simple as
15 under the preferences in the back end. But
16 that's not necessarily a quote, unquote,
17 defect.

18 Q. So when -- a situation when
19 overtime wasn't populating in the software,
20 would that be something you could address and
21 fix yourself or would you have to escalate
22 that?

23 A. Generally, that type of
24 troubleshooting, I would be able to fix,
25 because it's not very technical. It's just

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1 basically trying to copy the error that
2 they're receiving.

3 Q. Were there types of errors that
4 you trouble shot and then determined that you
5 could not fix?

6 A. Absolutely.

7 Q. And those you would escalate to
8 the...

9 A. First the project manager and
10 then it would go to our tech team, which we
11 would submit a ticket for them.

12 Q. Who would prepare the ticket?

13 A. I would.

14 Q. And when you say the "tech team,"
15 is that a group that sits in Little Rock or
16 was it a group that sits in Little Rock?

17 A. Not all of them are in Little
18 Rock, because we have probably more remote
19 employees than we do in office, but some of
20 them are in Little Rock, yes.

21 Q. Would there be a specific tech
22 person to whom you would submit the ticket?

23 A. No, it's whoever is available.
24 It would go to a queue and I'm not sure how
25 they distributed it on their side.

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1 Q. So you wouldn't get the contract
2 at that point to review?

3 A. No, generally, we would have to
4 go look up that information. We had, like, a
5 shared drive where a lot of documents would
6 be held at.

7 Q. Okay. So the notification from
8 the implementation manager of the assignment
9 would trigger your responsibility to look up
10 the documents?

11 A. Yes, sir.

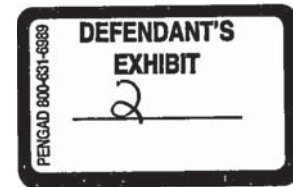
12 Q. And by the documents, at that
13 point, we're talking about the contract with
14 the client?

15 A. The solution design -- or well,
16 excuse me, I'm sorry, solution design hasn't
17 quite been there yet. Once it was my turn to
18 take the project, that's when I would look up
19 the documents; I didn't generally go in and
20 look up the documents when it was assigned to
21 the project manager.

22 Q. What documents could you have
23 looked up when it was assigned to the project
24 manager? You could look at the contract?

25 A. Just the contract at that point,

Suzanne F. Greene
Cell [REDACTED]
E-Mail: [REDACTED]



Objective: To obtain a leadership role in a company which offers opportunities for career advancement in a team oriented environment.

Employer: Tyler Technologies
Title: Implementation Consultant
Duration: February 2016 – Present
Job Duties

- Manage multiple client implementations simultaneously, while meeting all project plan deadlines.
- Build, lead and direct project teams to meet project objectives
- Strong leadership and delegation skills
- Set clear expectations and goals for project teams. Track progress against timeline, milestones and budget, revise as needed
- Hold regularly scheduled meetings with the client to ensure that milestones are met
- Provide software application training using a variety of delivery methods including web-based and on-site training
- Coordinate new customer implementations, providing effective training to maximize use the software
- Excellent communication (written and oral) and interpersonal skills
- Effective at engaging with people from all backgrounds and work industries

Employer: Allconnect
Title: Sales/Customer Service
Duration: August 2015 – January 2016
Job Duties:

- Detail oriented in order to ensure accuracy of information delivered to consumers and recorded for processing
- Utilizes consultative selling techniques to present key selling points, features and benefits while remaining focused on the customers' needs and expectations
- Demonstrates persistence, manage objections and strive to improve my skills and sales performance
- Effectively communicates and build relationships with customers to provide a world class customer experience
- Consistently exceed monthly sales objectives
- Effectively executes the entire sales process from opening to close while ensuring customer satisfaction

Employer: Highland Mortgage
Title: Loan Partner 1/Production Assistant
Duration: April 2014 – July 2015
Job Duties:

- Deliver performance excellence to mortgage/loan customers to ensure the origination of the relevant and appropriate loan products to meet their financial needs
- Observe the servicing practices of the mortgage branch team and management level associates from the customer perspective to develop and implement performance improvements
- Partner with manager and team to ensure operational excellence of the center and maintain a high level of customer satisfaction.
- Monitor the daily activities of the Branch including workflow, forecasting and customer satisfaction.

- Develop marketing strategies to build our customer base and maintain our current customer portfolio
- Create workforce stability by cultivating a productive and enthusiastic business team.
- Review team performance with manager and reinforce the accountability expectations for team and self.
- Establish communication, training and reporting processes to ensure the branch is operating to most current operational and security processes.
- Coach new hires to demonstrate professionalism, discretion and independent judgment, when performing work responsibilities.

Employer: Verizon

Title: Sales/Customer Retention/Service Representative

Duration: July 2006 – September 2013

Job Duties:

- Serviced 150 calls per day and resolved customer service inquiries on account related issues
- Achieved and maintained exceptional quality, productivity and sales results.
- Analyze customer portfolios to determine the best cross sell and upgrade opportunities
- Motivate team to maximize potential in all aspects of their job.
- Excellent verbal communication recommending relevant products to customers to deepen their business relationship with company
- Consistently exceeded incentive plans for top performing associates.
- Partner with executives to identify process improvements and develop counter measures to prevent the regression to previous ineffective performance practices
- Research and resolve escalated issues for customers and/or clients in an efficient and timely manner while transitioning to sales
- Take ownership for the resolution of customer complaints and resolved them in a manner that would ensure the retention of high valued customers
- Manage upset customers, conflicts and challenging situations
- Coached new team members to make a smooth transition to the live environment

Skills:

TSYS (Total Systems), Frontier, Microsoft Word, Excel, Outlook, and Power Point,